

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re: ) Chapter 11  
 )  
W. R. Grace & Co., et al., ) Case No. 01-1139 (JKF)  
 )  
 ) Jointly Administered  
Debtors. )  
 ) Hearing Date: September 24, 2007 at 2:00 p.m.  
 ) Objection Deadline: September 7, 2007 at 4:00 p.m.

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS TO ALTER AND AMEND THE COURT'S  
MODIFIED ORDER ESTABLISHING THE NON-WAIVER OF PRIVILEGES  
CONTAINED IN ANSWERS TO THE DEBTORS' INTERROGATORIES  
AND THE SEALING AND CONFIDENTIALITY OF SUCH ANSWERS**

TO: All parties on the attached service list.

The Official Committee of Unsecured Creditors (the "Committee") today filed the **Motion of the Official Committee of Unsecured Creditors Alter and Amend the Court's Modified Order Establishing the Non-Waiver of Privileges Contained in Answers to the Debtor's Interrogatories and the Sealing and Confidentiality of Such Answers** (the "Motion").

You are required to file any response to the attached Motion on or before **September 7, 2007 at 4:00 p.m.**

At the same time, you must also serve a copy of the response upon Movant's undersigned attorneys.

**A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE  
JUDITH K. FITZGERALD ON SEPTEMBER 24, 2007 AT 2:00 P.M.**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: Wilmington, Delaware  
August 20, 2007

Respectfully submitted,

**STROOCK & STROOCK & LAVAN LP**

Lewis Kruger  
Kenneth Pasquale  
(Members of the Firm)  
180 Maiden Lane  
New York, New York 1038-4982  
Telephone: (212) 806-5400  
Facsimile: (212) 806-6006

and

**DUANE MORRIS LLP**

  
Michael R. Lastowski (DE I.D. 3892)  
Richard W. Riley (DE I.D. 4052)  
William S. Katchen  
1100 North Market Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 657-4900  
Facsimile: (302) 657-4901

Counsel for the Official Committee of  
Unsecured Creditors